

## **EXHIBIT 1(a)**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

ROBERT BERG,

Plaintiff

- against -

Case No. 6:19-cv-418-JDK

M&F WESTERN PRODUCTS, INC.,

Defendant

**ROBERT BERG'S WITNESS LIST**

Judge Jeremy D. Kernodle	PLAINTIFF'S ATTORNEY: RICHARD LIEBOWITZ	DEFENDANT'S ATTORNEY: JOHN R. HARDIN JUDY B. JENNISON KIRSTIN E. LARSON
TRIAL DATE(S): January 19, 2021	COURT REPORTER: SHEA SLOAN	COURTROOM DEPUTY: EMMA FARRIS

Plaintiff Robert Berg respectfully reserves the right, in light of the on-going COVID-19 pandemic, to designate deposition testimony of witnesses on its list who are unable to attend trial because of travel restrictions, illness or other medical condition.

	<b>WITNESS NAME EMPLOYER TOPIC OF TESTIMONY</b>	<b>WILL CALL ("W") MAY CALL ("M") UNLIKELY TO CALL ("U")</b>	<b>EXPECTED TESTIMONY DURATION</b>
1.	Robert Berg, Owner/Designer Bob Berg Designs & Buckles  Mr. Berg will testify as to his background as a successful jewelry designer, the creation and registration of the Cross Designs, his relationship with Gary Bellinger and Defendant M&F, and M&F's actual copying of the Cross Designs without Berg's authorization	W	3.0 hours
2.	Monique Compton, National Sales Director Bob Berg Designs & Buckles  Ms. Compton will testify as to Bob Berg's background and the characteristics of the "Bob Berg Look" which distinguishes Berg's jewelry designs from his competitors.	W	2.0 hours
3.	Cary Kraft, M&F Western Products, Inc.  Mr. Kraft will testify regarding his work as a designer in the Western jewelry and buckle industry, his knowledge of and/or access to Berg's designs, and the creation of his accused designs.	W	2.0 hours
4.	Jeanne Crumrine LaShelle, M&F Western Products, Inc.  Ms. LaShelle will testify regarding her work as a designer in the Western jewelry and buckle industry, her knowledge of and/or access to Berg's designs, and the creation of her accused designs.	W	1 hour

	<b>WITNESS NAME EMPLOYER TOPIC OF TESTIMONY</b>	<b>WILL CALL ("W") MAY CALL ("M") UNLIKELY TO CALL ("U")</b>	<b>EXPECTED TESTIMONY DURATION</b>
5.	Paul Eddins, M&F Western Products, Inc.  Mr. Eddins will testify regarding his knowledge of Berg's designs, his knowledge of the distinguishing characteristics of Western-style jewelry designs, and the revenues and/or profits attributable to M&F Western's alleged infringement of Berg's Cross Designs	W	2.0 hours
6.	Steve Dees, Dees Cattle.  Mr. Dees will testify regarding the sale of his company 3-D Buckle Company, L.P. to M&F Western.	M	0.5 hour
7.	Plaintiff reserves the right to call any witnesses called by Defendant.		

Dated: November 24, 2020

Respectfully Submitted,  
LIEBOWITZ LAW FIRM, PLLC  
By: /s/richardliebowitz  
Richard P. Liebowitz  
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*Attorney for Plaintiff  
Robert Berg*

**Certificate of Service**

I hereby certify that on November 24, 2020, I served the foregoing PLAINTIFF'S WITNESS LIST on following counsel of record via e-mail.

John R. Hardin  
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*Attorneys for Defendant*

/s/richardliebowitz  
Richard Liebowitz

## **EXHIBIT 1(b)**

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
(TYLER DIVISION)

ROBERT BERG,

Plaintiff,

- against -

M&F WESTERN PRODUCTS, INC.

Defendant.

Docket No. 6:19-cv-00418-JDK

**PLAINTIFF'S OBJECTIONS TO DEFENDANT'S  
PRETRIAL DISCLOSURES**

Plaintiff Robert Berg respectfully submits the following objections to Defendant M&F Western Products, Inc. ("M&F Western"), pre-trial disclosures

**I. TRIAL WITNESSES**

- a. Wayne Baize, Corriente Buckle Company, 165 Hallas Road, Anthony, NM 88021, (575) 874-3697.

**Plaintiff's Objections: FRE 403**

- b. Robert Berg, Plaintiff.
- c. Steve Dees, General Partner, Dees Cattle, Formerly of: 3 D Buckle Company. L.P., P.O. Box 208, Schulenburg, TX 78956 (979) 561-6856.

**Plaintiff's Objections: FRE 403**

- d. David Eddins c/o Perkins Coie LLP, 500 N. Akard Street, Suite 3300, Dallas, TX 75201, 214-965-7700.

**Plaintiff's Objections: FRE 403**

- e. Mickey Eddins, c/o Perkins Coie LLP, 500 N. Akard Street, Suite 3300, Dallas, TX 75201, 214-965-7700.

**Plaintiff's Objections: FRE 403**

- f. Paul Eddins c/o Perkins Coie LLP, 500 N. Akard Street, Suite 3300, Dallas, TX 75201, 214-965-7700.

**Plaintiff's Objections: FRE 403**

- g. Chad Gist, Gist Buckle Company, 4385 Pleasant Valley Rd., Placerville, CA, USA 95667.

**Plaintiff's Objections: FRE 403**

- h. Cary Kraft, c/o Perkins Coie LLP, 500 N. Akard Street, Suite 3300, Dallas, TX 75201, 214-965-7700.

- i. Jeannie Crumrine LaShelle, c/o Perkins Coie LLP, 500 N. Akard Street, Suite 3300, Dallas, TX 75201, 214-965-7700.

- j. Gregg LaShelle c/o Perkins Coie LLP, 500 N. Akard Street, Suite 3300, Dallas, TX 75201, 214-965-7700.

**Plaintiff's Objections: FRE 403**

- k. Clint Mortensen, Mortensen Silver & Saddles, 96 Bonanza Creek Road, Santa Fe, NM 87508, 505-424-9330.

**Plaintiff's Objections: FRE 403**

- l. Clint Orms, Clint Orms Engravers & Silversmiths, 229B Old Ingram Loop, Ingram, TX 78025, (830) 367-7949

**Plaintiff's Objections: FRE 403**

- m. Curtis Spain, Benchmark Buckles, PO Box 2727, Forney, TX 75126, (214) 803-4039

**Plaintiff's Objections: FRE 403**

- n. Joanne Symons, 315 11th Street, Bandera, TX 78003.

**Plaintiff's Objections: FRE 402, 403**

- o.** Randy Rush, Molly's Custom Silver, 2900 Adams St., Riverside, CA 92504,  
951-776-0736

**Plaintiff's Objections: FRE 403**

- p.** Judy Wagner, Montana Silversmiths, #1 Sterling Lane, Columbus, MT 59019

**Plaintiff's Objections: FRE 403**

**II. DESIGNATED DEPOSITION TESTIMONY**

**III. TRIAL EXHIBITS**

<b>Exhibit No.</b>	<b>Bates Number</b>	<b>Description</b>	<b>Objections</b>
1.		June 10, 2020 Declaration of P. Eddins in Support of Defendant's Motion for Partial Summary Judgment ("June Eddins Decl.")	
2.		June 9, 2020 Declaration of C. Kraft in Support of Defendant's Motion for Partial Summary Judgment ("June Kraft Decl.")	
3.	M&F000805	Exhibit A to June Kraft Decl.: Program from the 1977 Leather Industries of America Award Presentation listing C. Kraft as the winner in the Men's Belts category.	
4.	M&F000803-804	Exhibit B to June Kraft Decl.: Corel files showing the design work of C. Kraft for a barrel buckle design	
5.		June 10, 2020 Declaration of J. Crumrine LaShelle in Support of Defendant's Motion for Partial Summary Judgment ("June LaShelle Decl.")	
6.	M&F000612-630	Exhibit A to June LaShelle Decl.: Asset Purchase Agreement between M&F Western and Crumrine Buckle Co.	
7.	M&F000003	Exhibit B to June LaShelle Decl.: Excerpt from the 1995 fall catalog of Crumrine Manufacturing Jewelers.	FRE 901
8.	M&F000631	Exhibit C to June LaShelle Decl.: Excerpt from 2002 Crumrine Manufacturing Jewelers catalog showing additional versions of the Crumrine Buckle.	FRE 901
9.		August 17, 2020 Declaration of S. Dees in Support of Defendant's Motion for Summary Judgment	
10.	M&F000586-611	Exhibit A to August 17, 2020 Declaration of S. Dees: Asset Purchase Agreement between M&F Western and 3-D Belt Company, L.P.	

11.	M&F001235-1236	Copyright Assignment Agreement between 3-D Belt Company L.P. (“Assignor”) and M&F Western Products, Inc. (“Assignee”).	
12.	M&F001237	Exhibit 1 to Copyright Assignment Agreement between 3-D Belt Company L.P. and M&F Western Products, Inc.	
13.		August 17, 2020 Declaration of C. Gist (“Gist Decl.”) in Support of Defendant’s Motion for Summary Judgment	FRE 402,403
14.	M&F000734-752	Exhibit A to Gist Decl.: Historic catalogs and photographs showing Gist designs incorporating a tapered-bead design.	FRE 402 403 901
15.	M&F000734-35	Exhibit A1 to Gist Decl.: June 4, 2020 email exchange between C. Gist and P. Eddins.	
16.	M&F000736	Exhibit A2 to Gist Decl.: images of various Gist Buckle designs.	
17.	M&F000737	Exhibit A3 to Gist Decl.: Gist Silversmiths design from 1996.	FRE 402, 403 901
18.	M&F000738	Exhibit A4 to Gist Decl.: Gist Silversmiths design from 1994.	FRE 402, 403, 901
19.	M&F000739	Exhibit A5 to Gist Decl.: Gist Silversmiths designs from 1996.	FRE 402, 403, 901
20.	M&F000740	Exhibit A6 to Gist Decl.: Gist Silversmiths design from 1996.	FRE 402, 403, 901

<b>21.</b>	M&F000741	Exhibit A7 to Gist Decl.: A copy of a photograph showing a Gist Silversmiths design from 1994.	FRE 402, 403, 901
<b>22.</b>	M&F000742	Exhibit A8 to Gist Decl.: Gist Silversmiths design from 1999.	FRE 402, 403, 901
<b>23.</b>	M&F000743	Exhibit A9 to Gist Decl.: front cover of a 1987 Gist Silversmiths catalog.	FRE 402, 403, 901
<b>24.</b>	M&F000744	Exhibit A10 to Gist Decl.: Gist Silversmiths design from 1993.	FRE 402, 403, 901
<b>25.</b>	M&F000745	Exhibit A11 to Gist Decl.: Gist Silversmiths design from 1998.	FRE 402, 403, 901
<b>26.</b>	M&F000746	Exhibit A12 to Gist Decl.: Gist Silversmiths design from 1998.	FRE 402, 403, 901
<b>27.</b>	M&F000747	Exhibit A13 to Gist Decl.: Gist Silversmiths design from 1996.	FRE 402, 403, 901
<b>28.</b>	M&F000748	Exhibit A14 to Gist Decl.: Gist Silversmiths design from 1997.	FRE 402, 403, 901
<b>29.</b>	M&F000749-752	Exhibit A15 to Gist Decl.: Gist Silversmiths Custom Bucks catalog from 1998.	FRE 402, 403, 901
<b>30.</b>		August 18, 2020 Declaration of P. Eddins in Support of Defendant's Motion for Summary Judgment	
<b>31.</b>		August 18, 2020 Declaration of C. Kraft in Support of Defendant's Motion for Partial Summary Judgment ("August Kraft Decl.").	

<b>32.</b>	M&F001292-1293	Exhibit 1 to August Kraft Decl.: Excerpts from 1996 Leegin Brighton Out West Spring catalog featuring the designs of C. Kraft.	FRE 901
<b>33.</b>	M&F0001294 - 1295	Exhibit 1A to August Kraft Decl.: Co.: Excerpts from 1996 Leegin Brighton Out West Fall catalog featuring the designs of C. Kraft.	FRE 901
<b>34.</b>	M&F000002	Exhibit 2 to August Kraft Decl.: buckle design #37678 from M&F Western's 2010 catalog.	
<b>35.</b>	M&F000020	Exhibit 3 to August Kraft Decl.: 32120 M&F Western Cross design from M&F Western's 2016 catalog.	
<b>36.</b>	M&F000019	Exhibit 4 to August Kraft Decl.: design of C. Kraft for M&F Western cross item 32110.	
<b>37.</b>	M&F000118	Exhibit 4A to August Kraft Decl.: photograph of item 32110.	
<b>38.</b>	M&F000111, M&F000112, M&F000115	Exhibit 5 to August Kraft Decl.: print out of the Art Cam Jewelsmith PDF files from the vector graphics designs of C. Kraft.	
<b>39.</b>		August 18, 2020 Declaration of J. Crumrine LaShelle in Support of Defendant's Motion for Partial Summary Judgment ("August LaShelle Decl.")	
<b>40.</b>	M&F000400-411, M&F000003	Exhibit 1A to August LaShelle Decl.: 1995 Crumrine fall catalog showing the 1995 Crumrine Buckle.	FRE 901
<b>41.</b>	M&F000631, M&F000654	Exhibit 1B to August LaShelle Decl.: Excerpt from Crumrine 2002 catalog depicting the "Patriot Series" buckle designs.	FRE 901
<b>42.</b>	M&F000633-695	Exhibit 1C to August LaShelle Decl.: Crumrine 2002 Retail Catalog.	FRE 901
<b>43.</b>	M&F000761-769	Exhibit 1D to August LaShelle Decl.: Trinity Designs by Crumrine Catalog circa 1980.	FRE 901

<b>44.</b>	M&F000778-785	Exhibit 1E to August LaShelle Decl.: Crumrine 1994 Fall Collection Catalog.	FRE 901
<b>45.</b>	M&F000787-800	Exhibit 1F to August LaShelle Decl.: Excerpts from the 1997-1998 Crumrine Land of Silver catalog.	FRE 901
<b>46.</b>	M&F001245-1255	Exhibit 1G to August LaShelle Decl.: Retail Price List Effective August 1, 1998 for the Land of Silver catalog.	FRE 901
<b>47.</b>	M&F001257	Exhibit 1H to August LaShelle Decl.: Crumrine 2000 Lightning Ridge flyer.	FRE 901
<b>48.</b>	M&F001259-1266	Exhibit 1I to August LaShelle Decl.: Crumrine 2001 Lightning Ridge catalog.	FRE 901
<b>49.</b>	M&F000111 M&F000112 M&F000019	Exhibit 2 to August LaShelle Decl.: graphics J. Crumrine LaShelle received from C. Kraft and used to engrave the copper mold for the M&F Western 32110 Cross design.	
<b>50.</b>	M&F001244	Exhibit 3 to August LaShelle Decl.: color photograph of the copper mold for the M&F Western 32110 Cross design engraved by J. Crumrine LaShelle.	
<b>51.</b>	M&F000110	Exhibit 4 to August LaShelle Decl.: black and white photograph of the copper mold for the M&F Western 32110 Cross design engraved by J. Crumrine LaShelle.	
<b>52.</b>	M&F000400-411	Excerpts from the 1995 Crumrine Fall Catalog.	FRE 901
<b>53.</b>	M&F000806-832, M&F000925-931	March 27, 2020 Demand letter sent by Wayne Baize of Corriente Buckle.	FRE 402, 403
<b>54.</b>	M&F000833-857	March 27, 2020 Demand letter sent by Robert Berg to Jeff Dees of Lone Star Buckles.	FRE 402, 403

<b>55.</b>	M&F000858-874	March 27, 2020 Demand letter sent by Robert Berg to Stacey Sloan of Rowdy Silver.	FRE 402, 403
<b>56.</b>	M&F000875-904, M&F000932-939	March 27, 2020 Demand letter sent by Joanne Symons of Hyo Silver.	FRE 402, 403
<b>57.</b>	M&F000708-710, M&F000716-718, M&F000905-910	March 27, 2020 Demand letter sent by and Eddie Fisher of Ridetuff.	FRE 402, 403
<b>58.</b>	M&F000911-924	March 27, 2020 Demand letter sent by Robert Berg to Matt Harris of Coolhorse & Champions Choice Silver.	FRE 402, 403
<b>59.</b>	M&F001322-1341	March 26, 2020 Demand letter sent by Robert Berg to Andy Andrews of A Cut Above Buckle.	FRE 402, 403
<b>60.</b>	M&F001342-1377	March 26, 2020 Demand letter sent by Robert Berg to Curtis Spain of Benchmark Buckles.	FRE 402, 403
<b>61.</b>	M&F001378-1390	March 27, 2020 Demand letter sent by Robert Berg to Kimberly Cones of K Bar Sam Buckles.	FRE 402, 403
<b>62.</b>	M&F001308-1314	April 15, 2020 Demand letter sent by Robert Berg to Rusty Badillo of RB Buckles.	FRE 402, 403
<b>63.</b>	M&F001315-1321	April 15, 2020 Demand letter sent by Robert Berg to Chad Gist of Gist Silversmiths.	FRE 402, 403
<b>64.</b>	M&F001267-1291	Article discussing examples of ancient cross designs and their features throughout history.	FRE 402, 403
<b>65.</b>	M&F000941	Facebook post by Robert Berg.	FRE 402, 403
<b>66.</b>	M&F000942	Facebook post by Robert Berg.	FRE 402, 403
<b>67.</b>	M&F000943-55	April 3, 2020 Email thread from Jo at Ridetuff to Paul Eddins.	FRE 402, 403

<b>68.</b>	M&F000946	March 27, 2020 Facebook post by Robert Berg.	FRE 402, 403
<b>69.</b>		October 15, 2018 Berg Visa Application Confirmation	
<b>70.</b>		Consulate letter confirming receipt of visa application	
<b>71.</b>		January 25, 2019 Australian police standard disclosure	
<b>72.</b>		Consulate visa denial letter	
<b>73.</b>		March 15, 2019 email from consulate denying visa	
<b>74.</b>		Consulate visa denial letter	

**END**

**Certificate of Service**

I hereby certify that on November 17, 2020, I caused to be served the foregoing PLAINTIFF'S OBJECTIONS TO DEFENDANT'S PRETRIAL DISCLOSURES on following counsel of record via e-mail.

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*Attorneys for Defendant*

/s/richardliebowitz  
Richard Liebowitz

**Certificate of Conference**

I hereby certify that I have multiple meet-and-confer sessions with Kirstin Larson, defense counsel regarding pre-trial submissions; however, indication was provided that Defendant needed more time to confer regarding Plaintiff's objections to Defendant's pretrial disclosures.

/s/richardliebowitz  
Richard Liebowitz

## **EXHIBIT 1(c)**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

ROBERT BERG,

Plaintiff

- against -

Case No. 6:19-cv-418-JDK

M&F WESTERN PRODUCTS, INC.,

Defendant

**PLAINTIFF'S DESIGNATED DEPOSITION TESTIMONY**

Plaintiff Robert Berg respectfully designates deposition testimony as follows:

A. **CARY KRAFT (Deposed Nov. 5, 2020)**

Kraft Testimony
Kraft Tr. 18:9-19
Kraft Tr. 19:8-10
Kraft Tr. 23:19-25
Kraft Tr. 30:9-20
Kraft Tr. 31:10-32:5
Kraft Tr. 38:12-20
Kraft Tr. 41:15-25
Kraft Tr. 43:14-20
Kraft Tr. 44:2-24

Kraft Testimony
Kraft Tr. 45:13-16
Kraft Tr. 46:20-25
Kraft Tr. 53:21-25
Kraft Tr. 54:8-15
Kraft Tr. 60:9-18
Kraft Tr. 61:15-20
Kraft Tr. 64:6-14
Kraft Tr. 74:3-8
Kraft Tr. 79:23-80:6
Kraft Tr. 91:22-92:3
Kraft Tr. 96:14-21
Kraft Tr. 113:19-114:6
Kraft Tr. 115:19-116:3

**B. PAUL EDDINS (Deposed Nov. 4, 2020)**

Eddins Testimony
Eddins Tr. 15:16-16:10
Eddins Tr. 26:4-12
Eddins Tr. 28:20-29:2
Eddins Tr. 29:11-12; 18-23
Eddins Tr. 30:22-31:6
Eddins Tr. 31:14-17; 21-25

<b>Eddins Testimony</b>
Eddins Tr. 32:2-5
Eddins Tr. 33:4-9
Eddins Tr. 36:6-12
Eddins Tr. 38:12-16
Eddins Tr. 42:13-20
Eddins Tr. 43:2-5
Eddins Tr. 44:19-45:10
Eddins Tr. 47:11-24
Eddins Tr. 49:7-19
Eddins Tr. 55:14-16
Eddins Tr. 57:9-58:11
Eddins Tr. 61:21-62:3
Eddins Tr. 62:18-23
Eddins Tr. 65:24-66:6
Eddins Tr. 68:13-69:8
Eddins Tr. 73:10-76:10
Eddins Tr. 76:25-77:21
Eddins Tr. 80:11-16
Eddins Tr. 81:20-25
Eddins Tr. 82:16-83:2
Eddins Tr. 85:25-86:19
Eddins Tr. 87:25-88:5

<b>Eddins Testimony</b>
Eddins Tr. 92:12-20
Eddins Tr. 96:7-10
Eddins Tr. 97:17-23
Eddins Tr. 102:21-103:11
Eddins Tr. 105:21-106:9

**C. JEAN LASHELLE (Deposed Nov. 6, 2020)**

<b>LaShelle Testimony</b>
LaShelle Tr. 27:3-28:15
LaShelle Tr. 33:9-34:4
LaShelle Tr. 34:15-35:3
LaShelle Tr. 35:10-16
LaShelle Tr. 37:4-23
LaShelle Tr. 38:10-14
LaShelle Tr. 73:12-15
LaShelle Tr. 85:7-12
LaShelle Tr. 88:16-21
LaShelle Tr. 89:2-9
LaShelle Tr. 106:16-18
LaShelle Tr. 107:16-109:18
LaShelle Tr. 115:16-116:4

Dated: November 24, 2020

Respectfully Submitted,  
LIEBOWITZ LAW FIRM, PLLC  
By: /s/richardliebowitz  
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*Attorney for Plaintiff  
Robert Berg*

**Certificate of Service**

I hereby certify that on November 24, 2020, I served the foregoing PLAINTIFF'S DEPOSITION DESIGNATIONS on following counsel of record via e-mail.

John R. Hardin  
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*Attorneys for Defendant*

/s/richardliebowitz  
Richard Liebowitz

## **EXHIBIT 1(d)**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

ROBERT BERG,

Plaintiff,

- against -

Case No. 6:19-cv-418-JDK

M&F WESTERN PRODUCTS, INC.,

Defendant.

**PLAINTIFF'S EXHIBIT LIST**

Judge Jeremy D. Kernodle	PLAINTIFF'S ATTORNEY: <b>RICHARD LIEBOWITZ</b>	DEFENDANT'S ATTORNEY: <b>JOHN R. HARDIN</b> <b>JUDY B. JENNISON</b> <b>KIRSTIN E. LARSON</b>
TRIAL DATE(S): <b>January 19, 2021</b>	COURT REPORTER: <b>SHEA SLOAN</b>	COURTROOM DEPUTY: <b>EMMA FARRIS</b>

EXHIBIT NUMBER	DATE OFFERED	ADMITTED	DESCRIPTION	BATES NUMBER (IF APPLICABLE)
<b>PX 1</b>			Copyright Registration No. VA 1-091-617, effective June 12, 2000 (Public Catalog)	n/a
<b>PX 2</b>			Copyright Registration No. VA 1-091-617, effective June 12, 2000 (Original Certificate)	RB_1576-77
<b>PX 3</b>			Deposit Copies, VA 1-091-617 (B&W)	n/a
<b>PX 4</b>			Deposit Copies, VA 1-091-617 (Color Examples)	RB_1751-62
<b>PX 5</b>			Copyright Registration No. VA 1-229-288, effective August 29, 2003 (Public Catalog)	n/a

<b>EXHIBIT NUMBER</b>	<b>DATE OFFERED</b>	<b>ADMITTED</b>	<b>DESCRIPTION</b>	<b>BATES NUMBER (IF APPLICABLE)</b>
<b>PX 6</b>			Deposit Copies, VA 1-229-288	n/a
<b>PX 7</b>			Copyright Registration No. VA 1-159-548, effective July 26, 2002 (Public Catalog Version)	n/a
<b>PX 8</b>			Copyright Registration No. VA 1-159-548, effective July 26, 2002 (Original Version)	RB_1613-15
<b>PX 9</b>			Deposit Copies, VA 1-159-548	n/a
<b>PX 10</b>			Infringement Compilation: M&F Western Products (side-by-side comparison)	n/a
<b>PX 11</b>			Trademark Deposit, showing first use Sept. 26, 1992	RB_1139
<b>PX 12</b>			Copyright Registration No. VA 530-294, effective October 23, 1992 (Original Certificate)	RB_0850-859
<b>PX 13</b>			Copyright Registration No. VA 1-096-096, effective December 27, 2000 (Original Certificate and Deposit Copies)	RB_1601-1611
<b>PX 14</b>			Bob Berg Buckle Designs	RB_1622-41
<b>PX 15</b>			Bob Berg Catalogs / Advertisements	RB_2149-52 RB_0833-41 RB_0846-49 RB_1570-1573
<b>PX 16</b>			Bob Berg Price Lists	RB_0829-32

<b>EXHIBIT NUMBER</b>	<b>DATE OFFERED</b>	<b>ADMITTED</b>	<b>DESCRIPTION</b>	<b>BATES NUMBER (IF APPLICABLE)</b>
<b>PX 17</b>			Bob Berg Quote 1996	RB_0153-156
<b>PX 18</b>			Berg Correspondence, dated October 20, 2003	RB_0259-261
<b>PX 19</b>			Letter from Professional Rodeo Association, dated January 8, 2004	RB_0230-231
<b>PX 20</b>			News Article re: Bob Berg (Cowboys & Country)	RB_0842-45
<b>PX 21</b>			Deposition transcript of JEAN LASHELLE, dated Nov. 6, 2020	n/a
<b>PX 22</b>			Deposition transcript of PAUL EDDINS, dated Nov. 4, 2020	n/a
<b>PX 23</b>			Deposition transcript of CARY KRAFT, dated Nov. 5, 2020	n/a
<b>PX 24</b>			Samples of Cease and Desist Letters (Sept.-Oct. 2003)	RB_549-673
<b>PX 25</b>			U.S. Bureau Customs – IP Rights Complaint (April 7, 2003)	RB_1558-69
<b>PX 26</b>			Plaintiff Robert Berg's Rule 26(e) Superseding Answers and Objections to Defendant's First Set of Interrogatories, dated November 9, 2020	n/a
<b>PX 27</b>			M&F Cross Pendent Designs	M&F_108; M&F_110-12; 115-16; M&F 259-62; M&F 453

<b>EXHIBIT NUMBER</b>	<b>DATE OFFERED</b>	<b>ADMITTED</b>	<b>DESCRIPTION</b>	<b>BATES NUMBER (IF APPLICABLE)</b>
<b>PX 28</b>			E-Mail from Kraft to Eddins, dated 12/2/19	M&F_113
<b>PX 29</b>			M&F Spring Preview 2016	M&F_117-156
<b>PX 30</b>			M&F Western Accessories June 2017	M&F 157-256
<b>PX 31</b>			M&F Buckles and Jewelry 2016	M&F 263-374
<b>PX 32</b>			M&F 2010 Spring Preview	M&F 375-394
<b>PX 33</b>			E-mail from Gregg LaShelle to Paul Eddins, dated September 25, 2019, with attachment of 1995 catalog	M&F 397-411
<b>PX 34</b>			E-mail from Paul Eddins to Steve Dees, dated December 12, 2019, with attaching of 2019 3-D Catalog	M&F 454-496
<b>PX 35</b>			Berg v. Symons, Decision and Order, dated Sept. 30, 2005 (S.D. Texas)	M&F 555-584
<b>PX 36</b>			M&F Sales Data (2016-2019)	M&F 585
<b>PX 37</b>			Asset Purchase Agreement b/w 3-D Belt Co. and M&F Western Products, Inc, dated December 21, 2018	M&F 586-611
<b>PX 38</b>			Asset Purchase Agreement b/w M&F and Crumrine, dated November 1, 2007	M&F 612-630

<b>EXHIBIT NUMBER</b>	<b>DATE OFFERED</b>	<b>ADMITTED</b>	<b>DESCRIPTION</b>	<b>BATES NUMBER (IF APPLICABLE)</b>
<b>PX 39</b>			Ex. A to Amended Complaint – Design Infringements	n/a
<b>PX 40</b>			Defendant's Answer to Amended Complaint	n/a
<b>PX 41</b>			Copy of Linear Cross Design	M&F 19
<b>PX 42</b>			Copy of Angular Cross Design	M&F 20
<b>PX 43</b>			Copy of Linear Cross Design – 2016 Calendar	M&F 21
<b>PX 44</b>			M&F Financial Spreadsheets [Confidential]	M&F 957-959
<b>PX 45</b>			Agreement b/w M&F and Cary Kraft	M&F 1238-1243

Dated: November 24, 2020

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Robert Berg*

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**Certificate of Service**

I hereby certify that on November 24, 2020, I served the foregoing PLAINTIFF'S EXHIBIT LIST on following counsel of record via e-mail.

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